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14 Attorneys for Defendant  
WAL-MART ASSOCIATES, INC.  
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16 **UNITED STATES DISTRICT COURT**  
17 **EASTERN DISTRICT OF CALIFORNIA**  
18

19 TAMARA GEIST, an individual,

20 Plaintiff,

21 vs.

22 WAL-MART ASSOCIATES, INC., a Delaware  
Corporation; and DOES 1 through 50, inclusive,

23 Defendants.  
24

Case No. 2:24-cv-01298-TLN-AC

**JOINT STIPULATION AND ORDER TO  
CONTINUE PRETRIAL DATES**

Action Filed:  
Trial Date:

May 6, 2024  
None Set

1 Plaintiff TAMARA GEIST (“Plaintiff”) and Defendant WAL-MART ASSOCIATES, INC.  
2 (“Defendant”), by and through their counsel, hereby stipulate and agree as follows:

3 WHEREAS, the Parties’ deadline to complete fact discovery is June 4, 2025;

4 WHEREAS, Plaintiff noticed a Rule 30(b)(6) deposition with twenty – one proposed matters  
5 of examination on May 5, 2025 to occur on a unilaterally selected date and time;

6 WHEREAS, Defendant objected to the noticed date due to unavailability of counsel as well  
7 as to the proposed topics of examination on May 22, 2025;

8 WHEREAS, the Parties require time to meet and confer on a mutually agreeable date and  
9 time for the Rule 30(b)(6) deposition to occur;

10 WHEREAS, the Parties require time to meet and confer on the proposed matters of  
11 examination;

12 WHEREAS, on March 21, 2025, Plaintiff mentioned several additional healthcare providers  
13 that were not included in her responses to Set One of Defendant’s Special Interrogatories, Nos. 11  
14 and 12 during her deposition;

15 WHEREAS, Plaintiff requires additional time to supplement her responses to Set One of  
16 Defendant’s Special Interrogatories, Nos. 11 and 12;

17 WHEREAS, Defendant requires additional time to subpoena the relevant medical records  
18 based upon receipt of Plaintiff’s supplemental responses to Set One of Defendant’s Special  
19 Interrogatories, Nos. 11 and 12;

20 WHEREAS, the Parties are making this request as soon as reasonably practicable once the  
21 Parties realized the necessity of the extension based on deposition availability and availability of  
22 information necessary to provide supplemental discovery responses;

23 WHEREAS, both Parties will suffer significant prejudice if the fact discovery deadline is not  
24 extended for the limited purposes of the Rule 30(b)(6) deposition and supplementation of Plaintiff’s  
25 responses to Set One of Defendant’s Special Interrogatories, Nos. 11 and 12, because neither Party  
26 will have sufficient time to conduct discovery necessary for trial;

27 WHEREAS, the Parties agree that neither Party will suffer any prejudice if the Court extends  
28 the fact discovery deadline for the limited purposes of the Rule 30(b)(6) deposition and

supplementation of Plaintiff's responses to Set One of Defendant's Special Interrogatories, Nos. 11 and 12;

WHEREAS, the Parties agree that the interests of justice are best served by *an extension of the fact discovery deadline for the limited purposes of the Rule 30(b)(6) deposition and supplementation of Plaintiff's responses to Set One of Defendant's Special Interrogatories, Nos. 11 and 12;*

**THEREFORE**, for the reasons set forth above, good cause exists for an extension of the June 4, 2025, fact discovery set forth in the May 6, 2024 Initial Pretrial Scheduling Order (Dkt. No. 4) solely for the purposes of the Rule 30(b)(6) deposition and supplementation of Plaintiff's responses to Set One of Defendant's Special Interrogatories, Nos. 11 and 12. Subject to the Court's approval the Parties stipulate and agree to the proposed revised deadlines below:

Event	Current Date	Proposed Date
Fact Discovery Cutoff for the Sole Purpose of the Rule 30(b)(6) Deposition of Walmart and Supplementation of Plaintiff's responses to Set One of Defendant's Special Interrogatories, Nos. 11 and 12 and that Defendant may Subpoena the Relevant Records Prior to the Close of Fact Discovery.	June 4, 2025	August 4, 2025

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1           **IT IS SO STIPULATED.**

2  
3           DATED: June 3, 2025

EXCELSIS LAW, P.C.

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5                           By: /s/ Zainah Alfi  
6                           C. Genevieve Jenkins  
7                           Zainah Alfi

8                           Attorneys for Plaintiff  
9                           TAMARA GEIST

10  
11           DATED: June 3, 2025

OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.

12  
13  
14                           By: /s/ James T. Conley  
15                           James T. Conley  
16                           Michele J. Bongiovanni  
17                           Sandra Benlevy

18                           Attorneys for Defendant  
19                           WAL-MART ASSOCIATES, INC.

20                           **SIGNATURE ATTESTATION**

21                           I attest that I have obtained concurrence in the filing of this document from the other  
22                           signatories in compliance with Local Rule 131(e).

23  
24           Date: June 3, 2025

25                           By: /s/ James T. Conley  
26                           James T. Conley

**ORDER**


The Court having read and considered the Parties' Joint Stipulation to Continue Pretrial Dates, and good cause appearing:

IT IS HEREBY ORDERED that the pretrial dates shall be as follows:

Event	Current Date	Proposed Date
Fact Discovery Cutoff for the Sole Purpose of the Rule 30(b)(6) Deposition of Walmart and Supplementation of Plaintiff's responses to Set One of Defendant's Special Interrogatories, Nos. 11 and 12 and that Defendant may Subpoena the Relevant Records Prior to the Close of Fact Discovery.	June 4, 2025	August 4, 2025

**IT IS SO ORDERED.**

Dated: June 3, 2025

  
\_\_\_\_\_  
Troy L. Nunley  
Chief United States District Judge